

ERIC GRANT  
United States Attorney  
ROBERT L. VENEMAN-HUGHES  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099  
Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

RANDALL THOMAS MCBRIDE  
Defendants.

CASE NO. 1:24-CR-00061-JAM-BAM  
1:14-CR-00233-JAM-BAM (TSR)

**STIPULATION AND ORDER TO SET CHANGE  
OF PLEA AND ADMIT/DENY HEARINGS**

IT IS HEREBY STIPULATED by and between the parties, that the trial confirmation set for September 9, 2025 before the Honorable John A. Mendez be vacated and a change of plea be set for October 21, 2025.

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. The parties have reached a resolution and filed a plea agreement.
2. By this stipulation, defendant now moves to set the change of plea on October 21, 2025, and to exclude time until that date. Time was previously excluded through October 20, 2025.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The parties are have reached a plea, and October 21 is the earliest convenient date where defense counsel and the court are available. Defendant desires to have his counsel with him at change of plea.
  - b) The government does not object to the continuance.

1 c) Based on the above-stated findings, the ends of justice served by continuing the  
2 case as requested outweigh the interest of the public and the defendant in a trial within the  
3 original date prescribed by the Speedy Trial Act.

4 d) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
5 et seq., within which trial must commence, the time period of October 20, 2025 to October 21,  
6 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv)  
7 because it results from a continuance granted by the Court at defendants' request on the basis of  
8 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
9 of the public and the defendants in a speedy trial.

10 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
11 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
12 must commence.

13 5. Defendant's trailing TSR matter, 1:14-cr-233, should be set for admission on the same  
14 date.

15  
16 Dated: August 27, 2025

Respectfully submitted,

17 ERIC GRANT  
18 United States Attorney

19 By /s/ Robert L. Veneman-Hughes  
20 ROBERT L. VENEMAN-HUGHES  
Assistant United States Attorney

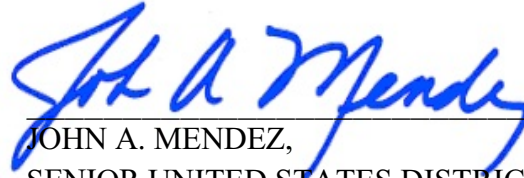
21 Dated: August 27, 2025

/s/ Richard Beshwate  
22 RICHARD BESHWATE  
23 Attorney for Defendant Randall McBRIDE  
24  
25  
26  
27  
28

**ORDER**

IT IS SO ORDERED that the dates be set and time be excluded as set forth above.

August 28, 2025



JOHN A. MENDEZ,  
SENIOR UNITED STATES DISTRICT JUDGE